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16 **UNITED STATES DISTRICT COURT**
 17 **DISTRICT OF NEVADA**

18 JYSAN HOLDING, LLC, a Nevada Limited
 19 Liability Company; JUSAN
 20 TECHNOLOGIES LTD, an England and
 Wales Limited Company;

21 Plaintiff,

22 v.

23 REPUBLIC OF KAZAKHSTAN, a foreign
 sovereign state; THE AGENCY FOR
 24 REGULATION AND DEVELOPMENT
 OF THE FINANCIAL MARKET OF THE
 25 REPUBLIC OF KAZAKHSTAN, a
 Kazakhstan Government agency; THE
 26 ANTI-CORRUPTION AGENCY OF THE
 REPUBLIC OF KAZAKHSTAN, a
 27 Kazakhstan Government anti-corruption
 agency ; THE FINANCIAL MONITORING
 28 AGENCY OF THE REPUBLIC OF

Case No. 2:23-cv-00247-JAD-VCF

**STIPULATION AND ORDER TO
 EXTEND TIME TO FILE DISCOVERY
 PLAN AND SCHEDULING ORDER
 (Second Request) AND TO RESPOND
 TO MOTION TO DISMISS OR AMEND
 THE COMPLAINT
 (Fourth Request)**

ECF Nos. 34, 35

1 KAZAKHSTAN, a Kazakhstan Government
 2 agency; THE COMMITTEE FOR
 3 NATIONAL SECURITY OF
 4 KAZAKHSTAN, a Kazakhstan Government
 5 intelligence agency; MADINA
 6 ABYLKASSYMOVA, an individual;
 7 OLZHAS KIZATOV, an individual;
 8 ARMAN OMARBEOV, an individual;
 9 and ADILBEK DZHAHAKSYBEKOV, an
 10 individual,

11 Defendants.

12 Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Omarbekov (the
 13 “Government Official Defendants”) filed a Motion to Dismiss the Complaint on April 13, 2023
 14 (ECF No. 23). Pursuant to the Court’s Order of June 2, 2023, the current deadline for the
 15 parties to submit a proposed Discovery Plan and Scheduling Order is June 26, 2023 (ECF No.
 16 31). Pursuant to the Court’s Order of June 2, 2023, the current deadline for Plaintiffs Jysan
 17 Holding, LLC and Jusan Technologies Ltd. (“Plaintiffs”) to respond to the Motion to Dismiss
 18 or to amend the Complaint is July 5, 2023 (ECF No. 33).

19 The parties are attempting to reach a resolution of this matter and require additional time
 20 to achieve such resolution. The parties have conferred and reached agreement on a 60-day
 21 extension of each deadline. This is the second stipulation for an extension of time to submit a
 22 Discovery Plan and Scheduling Order, the fourth extension of time to respond to the
 23 Government Official Defendants’ Motion to Dismiss, and the third extension of time to amend
 24 the Complaint under Fed. R. Civ. P. 15(a)(1)(B).

25 **IT IS HEREBY STIPULATED AND AGREED** that the parties’ time to submit a
 26 proposed Discovery Plan and Scheduling Order is extended to and including **August 25, 2023**,
 27 and Plaintiffs’ time to respond to the Government Official Defendants’ Motion to Dismiss or
 28 amend the Complaint pursuant to Fed. R. Civ. P. 15(a)(1)(B) is extended to and including
September 5, 2023¹.

¹ September 3, 2023, is a Sunday, and the following day is a federal holiday.

DATED this 26th day of June, 2023.

McNUTT LAW FIRM, P.C.

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/s/ J. Stephen Peek

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Jysan Holding, LLC; and
Jusan Technologies Ltd.*

ORDER

**Based on the parties' stipulation [ECF Nos. 34, 35] and with good cause
appearing, IT IS SO ORDERED.**


UNITED STATES DISTRICT JUDGE

DATED: 6/27/23